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Attorney for Defendant
BALBINO SABLAD

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00138-TLN
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO CONTINUE
vs.)	STATUS CONFERENCE
)	
BALBINO SABLAD)	
)	Date: November 18, 2021
)	Time: 9:30 a.m.
Defendant.)	Hon. Troy L. Nunley

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, Acting United States Attorney, through Assistant United States Attorney Mira Chernick, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah Labaree, attorney for BALBINO SABLAD, that the status conference, currently scheduled for November 18, 2021, be continued to January 13, 2022 at 9:30 a.m.

As of the date of this filing, counsel for the government has produced over 4500 Bates-stamped items of discovery, which defense counsel needs time to review. There is a protective order in place in this case which makes Mr. Sablad's review of certain portions of the material more time-consuming. As such, defense counsel needs additional time to review discovery, research the applicable law, meet with her client, and otherwise prepare for trial or alternative resolution of the case. Further, defense counsel will be out of the office on extended medical leave starting in early January. A continuance is necessary to guarantee Mr. Sablad continuity of

1 counsel.

2 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
3 excluded from November 18, 2021 through and including January 13, 2022; pursuant to 18
4 U.S.C. §3161 (h)(7)(A)and (B)(iv)[reasonable time to prepare] and General Order 479, Local
5 Code T4 based upon continuity of counsel and defense preparation.

6 Dated: November 16, 2021

7 HEATHER E. WILLIAMS
Federal Defender

8 /s/ Hannah Labaree
9 HANNAH LABAREE
Assistant Federal Defender
10 Attorney for Defendant
BALBINO SABLAD
11

12 Dated: November 16, 2021

13 PHILLIP A. TALBERT
Acting United States Attorney

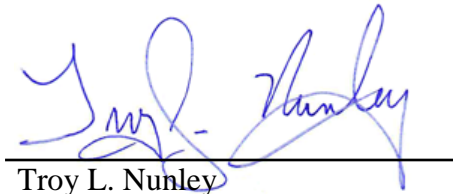
14 /s/ Mira Chernick
15 MIRA CHERNICK
Assistant U.S. Attorney
16 Attorney for Plaintiff
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ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from November 18, 2021, up to and including January 13, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the November 18, 2021 status conference shall be continued until January 13, 2022, at 9:30 a.m.

Dated: November 16, 2021


Troy L. Nunley
United States District Judge